

FICK & MARX LLP

24 Federal Street, Fourth Floor, Boston, MA 02110

William W. Fick
TEL: 857-321-8360
FAX: 857-321-8361
WFICK@FICKMARX.COM

February 28, 2023

By Email PDF and ECF

Patrick Callahan, Esq. (patrick.callahan@usdoj.gov)
David J. Derusha, Esq. (david.derusha@usdoj.gov)
Abraham R. George, Esq. (abraham.george@usdoj.gov)
Christopher Looney, Esq. (christopher.looney@usdoj.gov)
U.S. Attorney's Office
One Courthouse Way
Boston, MA 02210

Re: *United States v. Chin, et al.*, No. 21-cr-10256-RWZ

Dear Counsel:

Pursuant to Local Rule 116.3, we write on behalf of all defendants to request the following discovery:

1. Grand Jury Exhibits

The following grand jury exhibits were produced but are not mentioned in any of the grand jury transcripts that were produced. Please produce any testimony concerning these exhibits.

22; 23; 30; 61; 68; 72; 73; 74; 75; 89; 120; 137; 153; 311; 312; 313; 314; 315; 316; 317; 318; 319; 320; 325; 326; 329; 330; 331; 332; 334; 335; 336; 339; 340; 341; 342; 343; 344; 347; 348; 349; 350; 351; 352; 353; 301-T; 302-T; 303-T; 304-T; 305-T; 306-T; 307-T; 308-T; 309-T; 310-T, 319A

2. Search Warrant Affidavits and Attachments

Multiple search warrants were produced without the associated applications/affidavits and sometimes without the attachment describing the particular object(s) of the search. Please produce those materials.

Case Number	Search Object
16-mj-6192-MPK	adityahumad@kicventures.com, info@eall-ime.com, vanessadudley@callime.com, and associated data
16-mj-6193-MPK	website hosting account impartialmedicaexperts.com and associated data
16-mj-6297-MPK	email account adityahumad@kicventures.com and associated data

Patrick Callahan, Esq., et al.
 February 28, 2023
 Page 2 of 12

19-mj-1045-DLC	email account BIOinnovations@sbcglobal.net and associated data
19-mj-2330-MBB	email account melissa@meghealthcare.com and associated data
19-mj-08091-JPO	8645 Woodland Terrace, Lenexa, KS 66220
19-mj-08092-TJJ	John Balzer
19-mj-08093-JPO	email account BIOinnovations@sbcglobal.net and associated data
21-mj-6506-AOV	location data concerning AT&T cellular telephone assigned call number (617) 697-5442

3. Legal Basis for Search/Interception

The following cell phone extractions were produced without accompanying search warrants or consent-to-search documentation. Please produce all documents establishing the legal basis for the searches.

USAO-MA-ABD-000001 – Amanda Dalton’s iPhone 6s Report
 USAO-MA-BALZER-0000054 – John Balzer Samsung GSM
 USAO-MONTONE_0000002 – Montone iPhone 7(A1660)

The following recorded conversations were produced without any accompanying documentation of one-party consent or other legal basis. Please produce relevant documentation.

USAO-MON_0000002 between Monotone and Balzer
 USAO DP_0000002 between Humad and Pateder on 2017-04-11

4. Missing Native Format Files

For the following files, slip sheets were produced stating that the files are available in native format, but in fact, those files appear to be missing from the production. Please produce the files.

Beg. Bates	File Name
MIH0000524	BSHSI_Virginia_AppendixB_Spine_SpineFrontier.xlsx
MIH0000545	BSHSI_Virginia_AppendixB_Spine_SpineFrontier.xlsx
MIH0000560	BSHSI_Virginia_AppendixB_Spine_SpineFrontier_Return_02212013.xlsx
MIH0000643	BSHSI_Virginia_AppendixB_Spine_SpineFrontier_Final_02242013.xlsx
MIH0000661	BSHSI_Virginia_AppendixB_Spine_SpineFrontier_Final_02242013.xlsx
MIH0000767	BSHSI_Virginia_AppendixB_Spine_SpineFrontier_Final_02222013.xlsx
MIH0000781	BSHSI_Virginia_AppendixB_Spine_SpineFrontier_Final_02232013.xlsx
MIH0000794	BSHSI_Virginia_AppendixB_Spine_SpineFrontier_Final_02242013.xlsx
MIH0000847	BSHSI_Virginia_AppendixB_Spine_SpineFrontier_Final_02242013.xlsx
MIH0000863	BSHSI_Virginia_AppendixB_Biologic_SpineFrontier_04182013.xlsx

Patrick Callahan, Esq., et al.

February 28, 2023

Page 3 of 12

MIH0001084	Bon Secours_HR_Biologic_Appendix B_Spine Frontier_Final_03292014.xlsx
MIH0001087	Bon Secours_HR_Biologic_Appendix B_Spine Frontier_Final_03292014.xlsx
MIH0001133	Bon Secours_HR_Biologic_Appendix B_Spine Frontier_Final_03292014.xlsx
MIH0001176	Bon Secours_HR_Biologic_Appendix B_Spine Frontier_Final_03292014.xlsx
MIH0001227	Bon Secours_HR_Biologic_Appendix B_Spine Frontier.xlsx
MIH0001233	Bon Secours_RIC_Biologic_Appendix B_SpineFrontier.xlsx
MIH0001363	BSHSI_Virginia_AppendixB_Spine_SpineFrontier_Final_03192014.xlsx
MIH0001377	BSHSI_Virginia_AppendixB_Spine_SpineFrontier_Final_03242014.xlsx
MIH0001429	20140812_Spinefrontier_reconcile_4POs.xlsx
MIH0001444	Bon Secours_Biologic_Appendix B_Spine Frontier_Addendum_01202015.xlsx
MIH0001447	BSHSI_Virginia_AppendixB_Spine_SpineFrontier_Addendum_Final_01202015.xlsx
MIH0001477	Bon Secours_HR_Biologic_Appendix B_Spine Frontier_Final_03292014.xlsx
MIH0001524	Bon Secours_HR_Biologic_Appendix B_Spine Frontier_Final_03292014.xlsx
MIH0001613	Bon Secours Biologics Pricing.xlsx
MIH0001619	Bon Secours Biologics Pricing.xlsx
MIH0001620	Bon Secours_HR_Biologic_Appendix B_Spine Frontier_Final_03292014.xlsx
MIH0001631	Bon Secours_HR_Biologic_Appendix B_Spine Frontier_Sports Medicine_General Biologics_6.24.14.xlsx
MIH0001645	Bon Secours_Biologic_Appendix B_Spine Frontier_Addendum_11202014(2).xlsx
MIH0001648	BSHSI_Virginia_AppendixB_Spine_SpineFrontier_Addendum_Final_11202014.xlsx
MIH0001651	Bon Secours_Biologic_Appendix B_Spine Frontier_Addendum_09022015.xlsx
MIH0001700	Cervical Spacers_Tissue Net_Addendum.xlsx
MIH0001702	Bon Secours_Data for X-Ref_06-03-14.xlsx
MIH0001738	Bon Secours_Biologic_Appendix B_Spine Frontier_Addendum_09022015.xlsx
MIH0001744	Bon Secours_Biologic_Appendix B_Spine Frontier_Addendum_02022016.xlsx
MIH0001764	Bon Secours_Biologic_Appendix B_Spine Frontier_Addendum_02022016.xlsx
MIH0001781	Mary Immaculate P-LIFT.xlsx
MIH0001790	BSHSI_Virginia_AppendixB_Spine_SpineFrontier 05.16.xlsx
MIH0001799	02052015_BSHSI_Virginia_AppendixB_Spine_SpineFrontier_Final.xlsx
MIH0001804	02052015_BSHSI_Virginia_AppendixB_Spine_SpineFrontier_Final.xlsx
MIH0001805	Bon Secours_Biologic_Appendix B_Spine Frontier_Addendum_01202015.xlsx
MIH0001832	BSHSI_Virginia_AppendixB_Spine_SpineFrontier_Addendum_06132016.xlsx
MIH0001843	BSHSI_Virginia_AppendixB_Spine_SpineFrontier_Addendum_06142016.xlsx
MIH0001864	BSHSI_Virginia_AppendixB_Spine_SpineFrontier_Addendum_06142017.xlsx
MIH0001870	BonSecoursMissingItems.xlsx

Patrick Callahan, Esq., et al.

February 28, 2023

Page 4 of 12

MIH0001879	Bon Secours_Biologic_Appendix B_Spine Frontier_Addendum_01202015.xlsx
MIH0001882	BSHSI_Virginia_AppendixB_Spine_SpineFrontier_Addendum_Final_01202015.xlsx
MIH0001883	BonSecoursAddendum.xlsx
MIH0002001	BSHSI_Virginia_AppendixB_Spine_SpineFrontier_Addendum_06162017.xlsx
MIH0002013	Bon Secours_Biologic_Appendix B_Spine Frontier_Addendum_01202015.xlsx
MIH0002016	BSHSI_Virginia_AppendixB_Spine_SpineFrontier_Addendum_Final_01202015.xlsx
MIH0002027	BSHSI_Virginia_AppendixB_Spine_SpineFrontier_Addendum_06162017.xlsx
MIH0002035	BonSecoursAddendum.xlsx
MIH0002045	Bon Secours 3-30-17_Putty_Biologic_Appendix_Spine Frontier.xlsx
MIH0002050	Bon Secours_Biologic_Appendix B_Spine Frontier_Addendum_03302017.xlsx
MIH0002063	Bon Secours_Biologic_Appendix B_Spine Frontier_Addendum_03302017.xlsx
MIH0002069	Bon Secours_Biologic_Appendix B_Spine Frontier_Addendum_03302017.xlsx
MIH0002139	Bon Secours_HR_Biologic_Appendix B_Spine Frontier - ASH.xlsx
MIH0002160	Bon Secours_HR_Biologic_Appendix B_Spine Frontier_Final_03292014.xlsx
MIH0002163	Bon Secours_HR_Biologic_Appendix B_Spine Frontier - ASH.xlsx
MIH0002187	Bon Secours_RIC_Biologic_Appendix B_SpineFrontier.xlsx
MIH0002373	Bon Secours_HR_Biologic_Appendix B_Spine Frontier_Final_03292014.xlsx
MIH0002381	Mary Immaculate P-LIFT.XLSX
MIH0002385	Bon Secours_Biologic_Appendix B_Spine Frontier_Addendum_11202014(2).xlsx
MIH0002388	BSHSI_Virginia_AppendixB_Spine_SpineFrontier_Addendum_Final_11202014.xlsx
MIH0002406	Bon Secours_HR_Biologic_Appendix B_Spine Frontier_Final_03292014.xlsx
MIH0002544	Bon Secours_HR_Biologic_Appendix B_Spine Frontier.xlsx
MIH0002567	Bon Secours Biologics Pricing.xlsx
MIH0002568	Bon Secours_HR_Biologic_Appendix B_Spine Frontier_Final_03292014.xlsx
MIH0002630	BSHSI_Virginia_AppendixB_Spine_SpineFrontier_Final_03192014.xlsx
MIH0002737	BSHSI_Virginia_AppendixB_Spine_SpineFrontier_Final_03242014.xlsx
MIH0002780	BSHSI_Virginia_AppendixB_Spine_SpineFrontier_Final_03242014.xlsx
MIH0002803	Bon Secours_HR_Biologic_Appendix B_Spine Frontier.xlsx
MIH0002842	Bon Secours_Biologic_Appendix B_Spine Frontier_Addendum_03302017.xlsx
MIH0002861	Bon Secours_HR_Biologic_Appendix B_Spine Frontier - ASH.xlsx
MIH0002981	Bon Secours_HR_Biologic_Appendix B_Spine Frontier_Final_03292014.xlsx
MIH0002986	Bon Secours_Biologic_Appendix B_Spine Frontier_Addendum_03302017.xlsx
MIH0003000	BonSecoursAddendum.xlsx

Patrick Callahan, Esq., et al.

February 28, 2023

Page 5 of 12

MIH0003006	Bon Secours_HR_Biologic_Appendix B_Spine Frontier_Final_03292014.xlsx
MIH0003017	Bon Secours_Biologic_Appendix B_Spine Frontier_Addendum_03302017.xlsx
MIH0003021	BonSecoursMissingItems.xlsx
MIH0003026	BonSecoursMissingItems.xlsx
MIH0003035	Bon Secours_Biologic_Appendix B_Spine Frontier_Addendum_01202015.xlsx
MIH0003038	BSHSI_Virginia_AppendixB_Spine_SpineFrontier_Addendum_Final_01202015.xlsx
MIH0003056	BSV_Tracker TJR_Spine_2015 Addendums_04-29-15.xlsx
MIH0003071	Bon Secours_Biologic_Appendix B_Spine Frontier_Addendum_01202015.xlsx
MIH0003074	BSHSI_Virginia_AppendixB_Spine_SpineFrontier_Addendum_Final_01202015.xlsx
MIH0003079	02052015_BSHSI_Virginia_AppendixB_Spine_SpineFrontier_Final.xlsx
MIH0003080	Bon Secours_Biologic_Appendix B_Spine Frontier_Addendum_01202015.xlsx
MIH0003123	Bon Secours Fast Track Addendum 09022015.xlsx
MIH0003130	Bon Secours_Biologic_Appendix B_Spine Frontier_Addendum_09022015.xlsx
MIH0003210	GEN 3 Part Numbers Additions_Bon Secours.xlsx
MIH0003212	GEN 3 Part Numbers Additions_Bon Secours.xlsx
MIH0003253	BonSecoursAddendum.xlsx
MIH0003270	20140812_Spinefrontier_reconcile_4POs.xlsx
MIH0003350	BSHSI_Virginia_AppendixB_Spine_SpineFrontier_Addendum_06142017.xlsx
MIH0003363	BSHSI_Virginia_AppendixB_Spine_SpineFrontier_Addendum_06162017.xlsx
MIH0003374	BSHSI_Virginia_AppendixB_Spine_SpineFrontier_Addendum_06142017.xlsx
MIH0003386	BSHSI_Virginia_AppendixB_Spine_SpineFrontier_Addendum_06162017.xlsx
MIH0003403	BSHSI_Virginia_AppendixB_Spine_SpineFrontier_Addendum_06162017.xlsx
MIH0003446	Bon Secours_Biologic_Appendix B_Spine Frontier_Addendum_09022015.xlsx
MIH0003453	BSHSI_Virginia_AppendixB_Spine_SpineFrontier_Addendum_06132016.xlsx
MIH0003503	Bon Secours_Biologic_Appendix B_Spine Frontier_Addendum_02022016.xlsx
MIH0003519	Bon Secours_Biologic_Appendix B_Spine Frontier_Addendum_02022016.xlsx
MIH0003536	BSHSI_Virginia_AppendixB_Spine_SpineFrontier_Addendum_06142016.xlsx
MIH0003616	BSHSI_Virginia_AppendixB_Spine_SpineFrontier 05.16.xlsx
MIH0003624	02052015_BSHSI_Virginia_AppendixB_Spine_SpineFrontier_Final.xlsx
MIH0003645	Bon Secours_Biologic_Appendix B_Spine Frontier_Addendum_05152018.xlsx
MIH0003689	Bon Secours_Biologic_Appendix B_Spine Frontier_Addendum_04182018.xlsx
MIH0003703	BSHSI_Virginia_AppendixB_Spine_SpineFrontier_Addendum_04182018.xlsx

Patrick Callahan, Esq., et al.

February 28, 2023

Page 6 of 12

MIH0003744	BSHSI_Virginia_AppendixB_Spine_SpineFrontier_Addendum_Return_04202018.xlsx
MIH0003777	BSHSI_Virginia_AppendixB_Spine_SpineFrontier_Addendum_Final_05012018.xlsx
MIH0003779	Bon Secours_Biologic_Appendix B_Spine Frontier_Addendum_04182018.xlsx
MIH0003852	Bon Secours_Biologic_Appendix B_Spine Frontier_Addendum_04182018.xlsx
MIH0003957	Bon Secours_Biologic_Appendix B_Spine Frontier_Addendum_05152018.xlsx
MIH0003991	Bon Secours_Biologic_Appendix B_Spine Frontier_Addendum_04182018.xlsx
MIH0004005	BSHSI_Virginia_AppendixB_Spine_SpineFrontier_Addendum_04182018.xlsx
MIH0004009	BSHSI_Virginia_AppendixB_Spine_SpineFrontier_Addendum_Return_04202018.xlsx
MIH0004013	BSHSI_Virginia_AppendixB_Spine_SpineFrontier_Addendum_Final_05012018.xlsx
MIH0004023	Bon Secours_Biologic_Appendix B_Spine Frontier_Addendum_04182018.xlsx
MIH0004096	Bon Secours_Biologic_Appendix B_Spine Frontier_Addendum_04182018.xlsx
USAO-MA-OATH_00262441	11 Entire Reg List.xls
USAO-MA-OATH_00263296	2009 Partial return for 0113 (03-22-2010).pdf
USAO-MA-OATH_00262910	2009 Partial return for 0113 (03-22-2010).pdf
USAO-MA-OATH_00263297	2009 Partial return for 5399 (03-22-2010).pdf
USAO-MA-OATH_00262911	2009 Partial return for 5399 (03-22-2010).pdf
USAO-MA-OATH_00262469	BIOinnovations.xls
USAO-MA-OATH_00187614	fax-message01283219001.scr
USAO-MA-OATH_00262502	Insurance Company List.xls

Patrick Callahan, Esq., et al.

February 28, 2023

Page 7 of 12

USAO-MA-OATH_00262885	John B.xls
SF-00000119	NPIExpenseAnalysis (Sunshine)_SF-00000119.XLSX
Ullman-000283	Surgeon Profile.xlsx
Middlesex Hospital - 392645	Middlesex Hospital - 392645
Middlesex Hospital - 392662	Middlesex Hospital - 392662
Middlesex Hospital - 392663	Middlesex Hospital - 392663
NKCH_00003	NKCH_00003
NKCH_00004	Spine products.pptx.msg
NKCH_00006	NKCH_00006
NKCH_00007	Spine products.pptx.msg
NKCH_00009	NKCH_00009
NKCH_00010	Spine products.pptx.msg
NKCH_00012	NKCH_00012
NKCH_00013	Spine products.pptx.msg
NKCH_00015	NKCH_00015
NKCH_00016	RE_ I NEED HELP PLEASE.msg
NKCH_00018	NKCH_00018
NKCH_00019	RE_ I NEED HELP PLEASE.msg
NKCH_00023	NKCH_00023
NKCH_00024	RE_ I NEED HELP PLEASE.msg
NKCH_00028	NKCH_00028
NKCH_00029	RE_ All Vendors Spine RFI_Final.xlsx.msg
NKCH_00032	NKCH_00032
NKCH_00033	RE_ Spine RFI Emails - sent.msg
NKCH_00034	NKCH_00034
NKCH_00035	RE_ Spine RFI Emails - sent.msg
NKCH_00037	NKCH_00037
NKCH_00038	RE_ Spine RFI Emails - sent.msg
NKCH_00040	NKCH_00040
NKCH_00041	RE_ Spine RFI Emails - sent.msg
NKCH_00044	NKCH_00044
NKCH_00045	RE_ Spine RFI - submittals.msg
NKCH_00046	NKCH_00046
NKCH_00047	FW_ Spine RFI - submittals.msg
NKCH_00048	NKCH_00048
NKCH_00049	RE_ Spine RFI - submittals.msg

Patrick Callahan, Esq., et al.

February 28, 2023

Page 8 of 12

NKCH_00051	NKCH_00051
NKCH_00052	Re_Spine RFI - submittals.msg
NKCH_00054	NKCH_00054
NKCH_00055	RE_Spine RFI - submittals.msg
NKCH_00057	NKCH_00057
NKCH_00058	RE_Spine RFI - submittals.msg
NKCH_00061	NKCH_00061
NKCH_00062	RE_[EXTERNAL] Re_John Balzer.msg
NKCH_00063	NKCH_00063
NKCH_00064	FW_Sara Rush's budget reports.msg
NKCH_00066	NKCH_00066
NKCH_00067	FW_Sara Rush's budget reports.msg
NKCH_00069	NKCH_00069
NKCH_00070	2019 budget- surgery .msg
NKCH_00073	NKCH_00073
NKCH_00074	FW_Report AP270.msg
NKCH_00076	RE_Medtronic Biologics.msg
NKCH_00078	NKCH_00078
NKCH_00079	FW_Ortho-spine price files by Vendor.msg
NKCH_00096	FW_AP270 Report.msg
NKCH_00098	NKCH_00098
NKCH_00099	NKCH_00099
NKCH_00100	NKCH_00100
NKCH_00101	NKCH_00101
NKCH_00102	NKCH_00102
NKCH_00103	NKCH_00103
NKCH_00104	EPSi AP and Materials files for August 2015.msg
NKCH_00106	NKCH_00106
NKCH_00107	KH information.msg
NKCH_00108	KH EPM Budgeting_file_layouts_v2.pdf

5. Materials Shown to Witnesses During Interviews

We have been unable to locate or identify with certainty the following materials shown to witnesses during interviews. Please produce and/or identify each item among materials already produced.

Interview Subject	Materials Missing/Unidentified
Steven Anagnost	Tax Returns IME Submission sheets
Scott Autrey	Letter from Autrey including IME packet Text messages dated 4/30/2015 Text messages dated 1/26/2017

Patrick Callahan, Esq., et al.
 February 28, 2023
 Page 9 of 12

	Text messages dated 1/30/2017
Jeff Bash	Article attached to Aut01890 that does not have a Bates stamp number; Text document # 1 Text document # 2
Amanda Dalton	Text message on 10/5/2016 between Dalton, Autrey and Gus Conde
John Atwater	JGA000029 JGA000744 JGA000090 JGA000126 JGA000131 JGA0002564 JGA0001555 JGA000323-JGA000324 JGA000027 JGA000077 JGA000219 JGA000225 JGA000377 JGA000351 JGA000828 JGA000771 <i>Note: it appears that the entire production with JGA bates numbers is missing</i>
Kyle Black	JGA-000735 JGA-744 JGA-797 JGA-821 JGA-807 JGA-798
John Miller	email dated 9/2/2014 at 12:00PM which was referenced in the relator's disclosure; email dated 9/2/2014 at 12:08PM which was referenced in the relator's disclosure
Jason Montone	email - VANESSA DUDLEY LABELED NUMBER 7 SF-MON-00000120 IME-OATH-192894 MACKHAY CHECKS EXHIBIT IME-OATH-196693

Patrick Callahan, Esq., et al.

February 28, 2023

Page 10 of 12

Autumn Hornyack	ATTACHEMENT C, DATED: 9/16/2015 9/13/2017 Medical Staff Financial Conflict of Interest Disclosure and Certification Form 9/25/2019 Medical Staff Financial Conflict of Interest Disclosure and Certification Form
Vito Lore	Document with subject: Inspan — Coating (Meeting with John)
Jake Lubinski	CCS-DOJ-00022142
Zach Mikesell	Text messages between Mikesell and Dalton dated 5/3/2018 dated 2/19/2016 dated 11/12/2015
Jacob Rosenstein	email chain beginning on July 26, 2016 from Corazon Ramirez with the subject "Saint Camillus"; email from Scott Autrey to Aditya Humad dated January 6, 2016; email from Scott Autrey to Aditya Humad dated June 23, 2015; email from Scott Autrey to Aditya Humad dated June 23, 2015; email chain beginning on July 16, 2019 from Cora Galindo - Corazon Ramirez and Manuel Green with the subject "MEG-LOP - Bradford J. Insurance Information - be produced"; email chain beginning on September 21, 2015 from himself - Kevin Chappuis and Scott Autrey with the subject "Fractured screw"; email chain beginning on February 13, 2014 from Scott Autrey - Rosenstein with the subject "Spine Frontier and IME consulting agreement"; email chain beginning on April 18, 2014 from Dr. Kingsley Chin - Marc Pelletier and Aditya Humad with the subject "Dr Sheeraz and others"; email from May 6, 2014 from Aditya Humad - Rosenstein with the subject "Dr Rosenstein Follow-Up"; copy of his consulting agreement with impartial Medical Experts, dated March 17, 2014; email chain beginning on February 13, 2014 from Scott Autrey - Rosenstein with the subject "Spine Frontier and IME consulting agreement"; email chain between Dr. Kingsley Chin, Aditya Humad, Shyam Desigan and Rosenstein with the subject "Royalty Agreement."
Michelle Jereczek	Excel spreadsheet associated with SF-MCF-00023913

Patrick Callahan, Esq., et al.
 February 28, 2023
 Page 11 of 12

Agha Khan	a letter informing Kahn that his consulting services were being switched from SF to IME dated October 2013. A new contract was attached - this letter; signed IME agreement dated April 1, 2014; email from February 29, 2016.
Vivek Kushwaha	Timesheets
Jacqueline Mariano	email dated 02/29/2016 from Frank Schnur at SF
Michael Bacha	email sent - Bacha on 04/15/2015 from JENNA SANTARELLI; email which Bacha had sent - DUDLEY on 6/10/2016; email from 04/15/2018 congratulating ROSENSTEIN on his 122nd T-lift lumbar peak interbody cage case evaluation; feedback which KUSHWAHA had entered on IME spanning eight months from January - August of 2017; IME feedback from KUSHWAHA for June through September of 2018; feedback KUSHWAHA left on IME for July of 2018 which read "had good discussion w team on new screwdriver"
Michael Murray	Document: June 15, 2013 SpineFrontier Consulting Agreement Timesheet listing "month submitted for 2/1/2014" Timesheet listing "month submitted for 4/1/2014" Email dated April 4, 2014, subject RE: IME Users
Dhruv Patedar	"Form A" (that does not have any Bates numbers) which depicts consulting hours that he submitted – SF; Electronic timesheet submitted for February 2014 on March 4, 2014; Electronic timesheet submitted for December 2014 on January 6, 2015; Electronic timesheet submitted for April 2015 on May 11, 2015
Marc Pelletier	AK-401
Joseph Shehadi	Timesheet page 358 — Month submitted for: 7/1/2014 Timesheet page 353 — Month submitted for: 8/1/2014 Timesheet page 357 — Month submitted for: 9/1/2014 Timesheet page 354 — Month submitted for: 10/1/2014 Timesheet page 350 — Month submitted for: 11/1/2014 Timesheet page 355 — Month submitted for: 2/1/2015
Jason Tinley	Timesheets: Month submitted for: 10/1/2014 Month submitted for: 9/1/2014 Month submitted for: 12/1/2014

Patrick Callahan, Esq., et al.

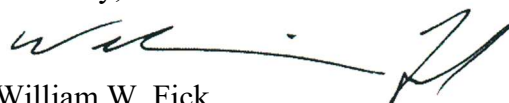
February 28, 2023

Page 12 of 12

	Month submitted for: 6/1/2015
Matthew Wasserman	Timesheets

Please let us know if you have any questions. Thanks for your attention to these matters.

Sincerely,



William W. Fick

cc: Clerk, U.S. District Court (by ECF)
Daniel Marx, Esq.
Barry Pollack, Esq.
Joshua Solomon, Esq.